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May 17, 2024

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VIA ECF

Honorable Magistrate Judge Robert W. Lehrburger
500 Pearl Street, Room 1960
United States Courthouse
New York, NY 10007
Lehrburger_NYSDChambers@nysd.uscourts.gov

Re: Presidio, Inc., et al. v. Driven Acquisition, Inc., d/b/a Driven Technologies, et al.,
Case No. 23-cv-6235 (S.D.N.Y.)

Dear Judge Lehrburger:

As Your Honor knows, we represent the Plaintiffs in the above-referenced action and write jointly on behalf of Plaintiffs and Defendants (collectively, the “Parties”), pursuant to Section I.F of Your Honor’s Individual Practices in Civil Cases, to request extension of the remaining discovery and pre-trial deadlines in the Civil Case Management Plan and Scheduling Order (ECF Doc. No. 21, the “Scheduling Order”) as follows:

Event	Current Deadline	Proposed New Deadline
Completion of fact discovery	May 20, 2024	September 26, 2024
Completion of expert discovery	July 8, 2024	November 11, 2024

The Parties previously requested an extension of the foregoing deadlines in the Parties’ Letter Motion for Extension of Discovery Deadlines filed on January 17, 2024. (ECF Doc No. 58). The Parties’ request was granted on February 21, 2024. (ECF Doc. No. 67.) The Parties request the Court consider further extension of discovery as provided above, and as they indicated at the discovery conference before Your Honor on March 26, 2024.

Good cause exists for this extension as, under the current Scheduling Order, fact discovery is set to close on May 20, 2024, but the Parties are still conferring regarding the need for supplemental document productions and, accordingly, no depositions have yet been held.

We thank the Court for its consideration of this matter and are at Your Honor’s disposal to provide any additional information the Court may require.

SheppardMullin

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Respectfully submitted,



Robert S. Friedman
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: All Counsel of Record

The extension is granted. The Court expects that the parties will complete discovery within this substantially extended period.

SO ORDERED:

05/17/2024



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE